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2 Q. And that would include Tysabri?

3 A. Yes.

4 Q. And also the Biogen interferon
5 product, correct?

6 A. Correct.

7 Q. Okay. When you joined in January
8 2012, what was your job title?

9 A. I was a VP of Global Business
10 Operations for the multiple sclerosis
11 franchise.

12 Q. And what did that entail?

13 A. That had multiple -- the role had
14 multiple dimensions, so I was a member of the
15 MS leadership team, and my responsibilities
16 were to assist in establishing the governance
17 and the business processes for the newly
18 formed business unit at Sanofi -- Genzyme
19 Sanofi company at the time.

20 And, in particular, I worked with
21 many cross-functional teams, including supply
22 chain. I worked with the regulatory team,
23 and I worked with the respective leaders of
24 our -- the functions within the MS franchise,
25 including the heads of the regions, as well

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2 as the head of the global marketing team, the
3 global medical affairs team, and the global
4 market access teams.

5 Q. And then, over time, did your job
6 function evolve at Sanofi Genzyme?

7 A. Yes, it did. In approximately the
8 middle part of 2014, I became the head of the
9 global commercial strategy group for the
10 global MS franchise.

11 Q. And what did that job function
12 entail?

13 A. That job provided oversight into
14 the global marketing teams for both Lemtrada
15 and Aubagio, as well as the global market
16 access teams, new product planning, and the
17 Global Market Intelligence teams, which
18 included competitive intelligence, market
19 research and forecasting for the MS
20 franchise.

21 Q. And then, subsequent to that, did
22 your job function evolve?

23 A. It did indeed. So 2 1/2 years ago
24 I entered my current role, which is heading
25 up the new product planning team for MS

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2 A. I didn't have an opinion
3 whether -- on its appropriateness at the
4 time.

5 Q. Do you know what --

6 A. I'm just merely reflecting the --
7 taking the notes from the meeting.

8 Q. Do you know what the phrase
9 "diligent efforts" means?

10 A. I mean, other than a specific
11 definition of diligent efforts?

12 Q. Yeah.

13 A. Doing everything within your power
14 to reach a desired outcome.

15 Q. Now, within the context of
16 Lemtrada, you were aware, were you not, that
17 Sanofi Genzyme was under a contractual
18 obligation to use diligent efforts to achieve
19 certain milestones, were you not?

20 MS. VENEZIA: Objection to the
21 form.

22 A. I was not explicitly aware of
23 that.

24 Q. You'll notice that in the notes of
25 the LRP of May of 2013, you indicate, in your

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2 [REDACTED]

3 Q. No, sir, please. Isn't that what
4 would actually --

5 THE REPORTER: What was the
6 beginning of that?

7 MS. VENEZIA: He's testifying
8 again.

9 BY MR. WEISS:

10 Q. Excuse me, sir. Isn't that the
11 current status before the budget cut?

12 MS. VENEZIA: Objection to the
13 form.

14 BY MR. WEISS:

15 Q. Reading this document in its
16 natural fashion, if you look at DWG, the sums
17 and the status, that this is yet another
18 budget cut and that what's going happen is,
19 although the study had previously been
20 targeted for first patient in in October of
21 2014, the study was just not going to be
22 funded now?

23 A. That's not my recollection.
24 Because if you look at, for example, on the
25 Aubagio teracles study, the status says stop

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2 December 2012, which would result in a 9.2
3 million euro difference between the current
4 proposal and the DWG review.

5 So I guess -- and, again, you
6 know, it's been a while since I looked at
7 this schedule, but my read is that that FPI
8 for October 14 was still in the plan. But,
9 again, that's my interpretation of this
10 schedule.

11 Q. But it just wasn't funded for
12 2013, right?

13 A. The proposal from the team was to
14 not fund it for 2013.

15 MR. WEISS: I have no further
16 questions for this witness.

17 MS. VENEZIA: Well, thank you
18 Mr. Underwood. The deposition is
19 closed.

20 THE VIDEOGRAPHER: The concludes
21 today's deposition. We are off the
22 report at 3:56.

23 (Deposition concluded at 3:56 p.m.)

24

25